

Exhibit B



NAILAH K. BYRD
CUYAHOGA COUNTY CLERK OF COURTS
1200 Ontario Street
Cleveland, Ohio 44113

Court of Common Pleas

New Case Electronically Filed:
September 5, 2018 11:16

By: CHRISTOPHER M. SAMS 0093713

Confirmation Nbr. 1485293

JEROME DOZIER

CV 18 903239

vs.

ARAMARK

Judge: PAMELA A. BARKER

Pages Filed: 1

IN THE COURT OF COMMON PLEAS

State of Ohio

County of Cuyahoga

} SS

Case No. _____

Jerome Dozier, Plaintiff

AFFIDAVIT OF INDIGENCE

vs

Aramark, Defendant

Jerome Dozier, being first duly sworn, says that he is the Plaintiff in the above captioned matter and has not sufficient funds to pay the security for costs in this action pursuant to Local Rules and submits the following information in support of said allegation of property:

PLACE OF EMPLOYMENT Hilton Hotel - Cleveland

LENGTH OF TIME EMPLOYED From May 3, 2018 To Present

GROSS WEEKLY INCOME \$ 440

TOTAL GROSS INCOME FROM ALL SOURCES IN LAST TWENTY-SIX (26) WEEKS \$ 7,300

TOTAL ASSETS:

CASH ON HAND OR ON DEPOSIT \$ 5

REAL ESTATE N/A MARKET VALUE \$ N/A MORTGAGES \$ N/A

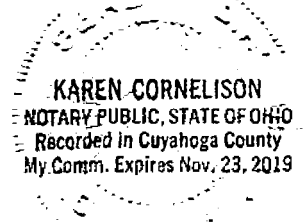
VALUE OF AUTOMOBILE \$ N/A

I hereby represent that the information set forth above concerning my financial condition is true and complete to the best of my knowledge and belief.

Jerome Dozier

SWORN TO AND SUBSCRIBED IN MY PRESENCE: this 18th day of August, 2018

Karen Cornelison
Notary Public - SIGNATURE





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IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

JEROME DOZIER
11500 Huffman Road, #232
Parma, OH 44130

Plaintiff,

v.

ARAMARK
18101 Lorain Ave.
Cleveland, OH 44111

Defendant.

) Civil Action No. _____

) Judge _____

) **COMPLAINT FOR DISABILITY**
) **DISCRIMINATION**

) **JURY DEMAND ENDORSED HEREON**

Plaintiff Jerome Dozier ("Plaintiff") alleges as follows for his Complaint against Defendant Aramark ("Defendant"):

1. Plaintiff worked for Defendant in Cuyahoga County, Ohio.
2. Defendant conducts business in Cuyahoga County, Ohio.
3. This Court has subject matter and personal jurisdiction over the claims raised in this Complaint.
4. Venue is proper in Cuyahoga County, Ohio.
5. Plaintiff has suffered damages in excess of \$50,000.
6. Plaintiff has hired the undersigned counsel and has agreed to pay them reasonable attorney's fees and costs if they are successful on one or more of the claims set forth herein.
7. Plaintiff worked for Defendant as a Production Cook.
8. Plaintiff worked for Defendant from on or about October 16, 2016 until Defendant terminated his employment on or about February 20, 2018.
9. Plaintiff suffers from physical impairments that substantially limit one or more of his major life activities.

10. Defendant was aware of Plaintiff's disabilities.
11. Plaintiff has a record of physical impairments.
12. Defendant regarded Plaintiff as having physical impairments.
13. Plaintiff was qualified for his job as a Production Cook.
14. Plaintiff suffers from arthritis in his back, kidney problems, high blood pressure related to the kidney problems, and he also suffered from a heart attack and a stroke.
15. Due to Plaintiff's disabilities, Plaintiff is forced to use a cane and occasionally forced to sit down.
16. Plaintiff could perform the essential functions of his job as a Production Cook with a reasonable accommodation of him missing work for a short period of time due to his disability.
17. On or about February 19, 2018, Plaintiff requested a short leave of absence due to his disability.
18. Plaintiff made this request after he suffered from a stroke.
19. Defendant did not grant Plaintiff the reasonable leave of absence that he requested.
20. Instead, on or about February 20, 2018, just one day after Plaintiff requested leave, Defendant terminated Plaintiff's employment.
21. Defendant claimed that it was terminating Plaintiff due to the number of absences that he had. However, this reason is a mere pretext.
22. Defendant actually terminated Plaintiff because of his disability.

COUNT I
DISABILITY DISCRIMINATION

23. Plaintiff re-alleges each allegation set forth in paragraphs 1-22 above.

24. In violation of Ohio Revised Code Sections 4412.02 and 4112.99, Defendant discriminated against Plaintiff because of his disability, because of his record of being disabled, or because of perceived disabilities.

25. Plaintiff was qualified for his job.

26. Plaintiff could perform the essential functions of his job with a reasonable accommodation.

27. Plaintiff suffered an adverse employment action when Defendant refused to reasonably accommodate his disability and terminated his employment.

28. Plaintiff has been damaged by Defendant's disability discrimination.

29. Defendant's conduct is the cause of Plaintiff's damages.

30. Defendant acted with actual malice, entitling Plaintiff to punitive damages and his attorney's fees and costs.

COUNT II
FAILURE TO PROVIDE REQUESTED RECORDS

31. Plaintiff re-alleges each allegation set forth in paragraphs 1-30 above.

32. On March 27, 2018, a person acting on behalf of Plaintiff sent a request to Defendant for documents and records required to be kept and produced pursuant to Ohio Revised Code Section 4111.14(F)-(G) together with a notarized release.

33. Defendant received the request for documents and records regarding Plaintiff that are required to be kept and produced pursuant to Ohio Revised Code Section 4111.14(F)-(G)

34. Defendant did not produce any documents or records in response to the request.

35. Plaintiff may bring this action pursuant to Ohio Revised Code Section 4111.14(K).

36. Defendant is liable for the costs and reasonable attorney's fees of Plaintiff pursuant to Section 34(a) of Article II of the Ohio Constitution.

WHEREFORE, Plaintiff demands judgment against Defendants for his lost wages, reinstatement or front pay, lost fringe benefits, statutory damages, emotional distress, and any other compensatory damages, punitive damages, prejudgment interest at the statutory rate, interest on unpaid wages pursuant to Ohio Revised Code 4113.15, post-judgment interest, attorney's fees and costs, and all other relief to which he is entitled.

JURY TRIAL DEMANDED.

Respectfully submitted,

/s/ Christopher M. Sams
Stephan I. Voudris, Esq.
Supreme Court No. 0055795
Christopher M. Sams, Esq.
Supreme Court No. 0093713
Voudris Law LLC
8401 Chagrin Road, Suite 8
Chagrin Falls, OH 44023
svoudris@voudrislaw.com
csams@voudrislaw.com
440-543-0670
440-543-0721 (fax)
Counsel for Plaintiff

CASE NO. CV18903239	D1 FX	SUMMONS NO. 36376717
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CLEVELAND, OHIO 44113

Rule 4 (B) Ohio

Rules of Civil
Procedure

SUMMONS

JEROME DOZIER VS ARAMARK	PLAINTIFF DEFENDANT
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ARAMARK
18101 LORAIN AVE.
CLEVELAND OH 44111

Said answer is required to be served on:



Plaintiff's Attorney

CHRISTOPHER M. SAMS
8401 CHAGRIN RD #8

CHAGRIN FALLS, OH 44023-0000

Case has been assigned to Judge:

PAMELA A BARKER
Do not contact judge. Judge's name is given for
attorney's reference only.

DATE SENT
Sep 6, 2018

NAILAH K. BYRD
Clerk of the Court of Common Pleas

Alfred F. [Signature]

By _____
Deputy



COMPLAINT FILED 09/05/2018





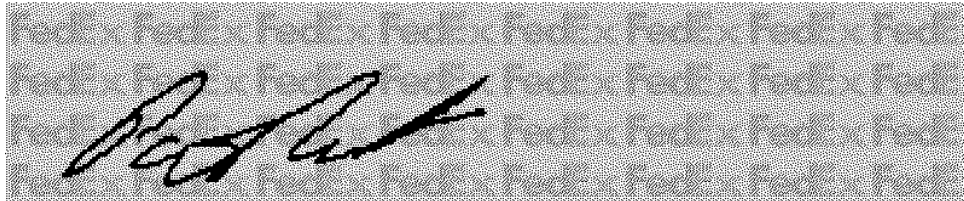
September 12, 2018

Dear Customer:

The following is the proof-of-delivery for tracking number **782650885571**.

Delivery Information:

Status:	Delivered	Delivered to:	Shipping/Receiving
Signed for by:	P.PATRICK	Delivery location:	18101 LORAIN AVE CLEVELAND, OH 44111
Service type:	FedEx Express Saver	Delivery date:	Sep 11, 2018 08:21
Special Handling:	Deliver Weekday Direct Signature Required		



Shipping Information:

Tracking number:	782650885571	Ship date:	Sep 6, 2018
		Weight:	0.5 lbs/0.2 kg

Recipient:
ARAMARK
18101 LORAIN AVE.
CLEVELAND, OH 44111 US

Shipper:
CCoC
1200 Ontario
Cleveland, OH 44113 US

Reference
Invoice number

CV18903239
36376717

Thank you for choosing FedEx.